

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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EDDYS N. GARCIA, as Administrator of the  
Goods, Chattels and Credits which were  
of WENDY SANTOS, deceased, EDDYS N.  
GARCIA, individually, EDDY I. GARCIA, an  
infant by his father and natural guardian,  
EDDYS N. GARCIA, and KENNY J. GARCIA, an  
infant by his father and natural guardian,  
EDDYS N. GARCIA,

**DEMAND FOR  
EXPERT WITNESS  
INFORMATION**

07 CIV 4045

Plaintiffs,

-against-

GINNETTI TRUCKING, LLC,

Defendant.

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Plaintiff, EDDYS N. GARCIA, requests that defendants,  
GINNETTI TRUCKING, LLC, identify each person defendant expects  
to call as a expert witness at the trial of this matter by  
stating for each such expert witness, with all detail available  
to defendant:

1. His or her name, residential and professional  
address, title and employer;
2. The substance of each and every fact upon which he or  
she expects to testify;
3. The substance of each and every opinion upon which he  
or she expects to testify;
4. A summary of each and every ground for such  
opinion(s); and,
5. His or her qualifications, including but not limited  
to, such persons educational and employment history,

publications, prior expert testimony, experience in the field (s) in which the opinion(s) will be offered, and all other factors upon which defendant expects to rely in qualifying such person as an expert.

This request is continuing in nature, and accordingly, must be supplemented or modified as soon as information contained in any response hereto becomes inaccurate or incomplete.

Dated: New York, New York  
June 13, 2007

GAIR, GAIR, CONASON,  
STEIGMAN & MACKAUF  
Attorneys for Plaintiffs

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